

Affidavit of Facts

Response to FEC Complaint – MUR 6916

Jennifer Garrison for Congress

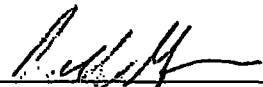
Russell K Garrison – Treasurer

And now comes, Russell K. Garrison, duly sworn, and states the following facts are true based on his knowledge and belief:

- 1) I received notification of the complaint from the FEC by regular mail on 3/6/2015 and I am responding within the prescribed 15 day window.
- 2) Jennifer Garrison for Congress was initiated in July, 2013 and terminated in January, 2015. The campaign committee was only active for the 2014 election cycle for the 6<sup>th</sup> Congressional District in Ohio.
- 3) Jennifer Garrison for Congress did not contract with Catalist, nor have any contact with them during or prior to this election cycle.
- 4) NGP Software was utilized and paid for by Jennifer Garrison for Congress for FEC Compliance and managing call time for the candidate's fundraising activity, it was not utilized for any other functionality.
- 5) All names entered into NGP software for the campaigns use were generated by the campaign from public sources, from personal contacts of the candidate or from information provided by contributors, volunteers or other individual interaction with the campaign.
- 6) Email outreach for the campaign was handled outside of NGP Software. Email lists were generated by the campaign from personal contacts of the candidate or from information provided by individuals interacting with the campaign or from lists purchased and reflected in the campaign finance records submitted to the FEC.
- 7) All other lists used for direct mail and other voter outreach were based on data that is available to the public from the Ohio Secretary of State, local boards of elections or other public sources.
- 8) If there was data available in any system that the campaign had access to which provided information not accessible from public sources, the campaign did not utilize the information.

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The Foundation for Accountability and Civic Trust alleges, that Jennifer Garrison for Congress received lists and information not available publicly. Given that Jennifer Garrison for Congress only used information available from public sources, Jennifer Garrison for Congress and Russell K Garrison – Treasurer should be removed from the complaint and no further action taken.



Russell K Garrison  
Former Treasurer – Jennifer Garrison for Congress


3/9/2015  
Date

STATE OF OHIO )

COUNTY OF WASHINGTON ) SS

Before me, a Notary Public for the State of Ohio appeared Russell K Garrison, known or acknowledged to me to be the person whose name is subscribed to the within instrument, and acknowledged that he executed same for the purposes therein contained.

In testimony whereof, I have subscribed my name and affixed my seal this 9<sup>th</sup> day of March, 2015.

  
Notary Public



Chelsea M. Bone  
Attorney at Law  
Notary Public, State of Ohio  
My Commission Has No Expiration Date  
O.R.C. Section 147.03